

**FITAPELLI & SCHAFFER, LLP**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**LUIS ESPINOZA and EUDOXIO ADAN IGLESIAS, on  
behalf of themselves and all others similarly situated,**

**Plaintiffs,**

**13 Civ. 1727 (FB)(RML)**

**-against-**

**WANRONG TRADING CORP., YI ANG SHAO, and  
XIANG QI CHEN,**

**Defendants.**

**NOTICE OF PLAINTIFFS' MOTION  
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement ("Motion for Final Approval") and in the Declaration of Brian S. Schaffer in Support of Plaintiffs' Motion for Final Approval (the "Schaffer Declaration"), Plaintiffs respectfully request that the Court enter an Order:

(1) granting final approval of the Joint Settlement Agreement and Release ("Settlement Agreement"), attached as Exhibit A to the Schaffer Declaration;

(2) certifying the following settlement class under Federal Rule of Civil Procedure 23(a) and (b)(3) for purposes of effectuating the settlement:

All individuals working at Wanrong Trading Corp. ("Wanrong") between April 1, 2007 and July 24, 2014 as delivery workers, loaders, stockpersons, processors, assemblers, and similarly situated employees (including workers performing meat processing, packing, cleaning, and office work), who are not related to the individual Defendants Yi Ang Shao and Xiang Qi Chen, and who have not timely opted-out of the Class.

- (3) issuing final approval of the FLSA settlement;
- (4) approving service awards to Luis Espinoza, Eudoxio Adan Iglesias, and Ruben Ramirez, as outlined in the Settlement Agreement;
- (5) awarding Class Counsel's attorneys' fees and costs, as outlined in the Settlement Agreement;
- (6) approving Plaintiffs' proposed final settlement procedure; and
- (7) granting such other, further, or different relief as the Court deems just and proper.

Dated: New York, New York  
December 8, 2014

Respectfully submitted,

/s/ Brian S. Schaffer

Brian S. Schaffer

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